

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE MEDICAL PROPERTIES TRUST, INC.
SECURITIES LITIGATION

Case No. 1:23-cv-008597-VSB
Hon. Vernon S. Broderick

CLASS ACTION

**NOTICE OF DEFENDANTS' MOTION TO DISMISS
THE FIRST AMENDED COMPLAINT**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law dated January 14, 2025, the Declaration of Nathaniel Cullerton dated January 14, 2025, and all prior pleadings and proceedings had herein, Defendants Medical Properties Trust, Inc., Edward K. Aldag, Jr., R. Steven Hamner, and J. Kevin Hanna, by and through undersigned counsel, hereby move under Federal Rules of Civil Procedure 9(b) and 12(b)(6) and the Private Securities Litigation Reform Act, 15 U.S.C. § 78u-4, for the reasons set forth in the accompanying Memorandum of Law, for dismissal of Plaintiffs' First Amended Complaint with prejudice.

Dated: January 14, 2025

WACHTELL, LIPTON, ROSEN & KATZ

/s/ Nathaniel Cullerton

William Savitt
Sarah K. Eddy
Nathaniel Cullerton
Adabelle U. Ekechukwu
51 West 52nd Street
New York, NY 10019
Tel.: (212) 403-1000

Attorneys for Defendants